



A PROJECT OF ISSUE ONE

DIGITAL DISASTER

*The failures of Facebook, Google, and Twitter's
political ad transparency policies*





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Acknowledgments

This report was written by Michael Beckel, manager of research, investigations, and policy analysis; research assistant Amisa Ratliff; and research intern Alex Matthews.
Design by Sydney Richards.

About Don't Mess With US

Don't Mess With US, a project of Issue One, is working to stop foreign interference in our elections.

About Issue One

Issue One is the leading cross-partisan political reform group in Washington. We unite Republicans, Democrats, and independents in the movement to increase transparency, strengthen ethics and accountability, and reduce the influence of big money in politics. Issue One's [ReFormers Caucus](#) of more than 200 former members of Congress, governors, and Cabinet officials is the largest bipartisan coalition of its kind ever assembled to [advocate for solutions](#) to fix our broken political system.

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DIGITAL DISASTER

By Michael Beckel, Alex Matthews, and Amisa Ratliff

Executive summary

Foreign interference in our elections is a national emergency, with hostile actors launching cyberattacks against Democrats and Republicans alike. Foreign adversaries — including [Russia](#), [Iran](#), [North Korea](#), and others — [are undermining](#) our political system by using [disinformation campaigns](#) on our largest social media networks, including [purchasing online ads](#) to sow division and discord in our country.

Between 2015 and 2017 alone, an estimated [11.4 million Americans](#) saw Facebook ads paid for by Russian government-linked entities — that's equivalent to the combined number of votes cast in 2016 in the swing states of Michigan, Minnesota, and Wisconsin.

In response to this foreign interference, [Facebook](#), [Google](#), and [Twitter](#) voluntarily made changes to their political advertising policies to increase transparency and make it harder for foreigners to purchase ads. They also created new searchable databases of political ads.

While these efforts are an improvement, they are woefully inadequate, and they do not measure up to the existing standards that govern political advertising on radio and television. In short, the platforms' policies are a mess, and the databases they've created to help the public monitor digital ad spending in U.S. elections are deeply flawed.

The piecemeal, voluntary approaches taken by Facebook, Google, and Twitter make a compelling case for uniform standards and policies set by Washington such as the [Honest Ads Act](#) — the bipartisan legislation supported by Issue One that was drafted in direct response to foreign interference in the 2016 election.

Today, each company defines and enforces political ad “transparency” differently. Each platform has different rules about who can buy political ads, how ad sponsors are verified, and how ads are categorized as “political.” And because there are no uniform standards, these companies also display uneven amounts of information about the people and groups behind online political ads.

For this analysis, Issue One pored over data related to thousands of political advertisers on Facebook, Google, and Twitter. Even as experts well-versed in political advertising and government data, we encountered problems in these companies' political ad archives and experienced major challenges using each database. We found that the databases sometimes obscured the true sources of funding behind digital ads. Some ads lacked disclaimers. Others were sponsored by groups with misleading names. And some even listed intermediaries as ad sponsors rather than naming the true bankrollers of advertising efforts. (See the “Case Studies” section of this report for more details and specific examples.)

**Foreigners could still
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did in 2016.**

The weaknesses we've highlighted in this report mean foreigners could still be violating federal laws that prohibit them from spending money in elections by purchasing ads on social media platforms – just as they did in 2016.

These databases are little more than giant public relations campaigns that these companies could change without notice or stop at any time. In fact, if Congress passes poor disclosure laws, any positive steps that companies voluntarily have taken could be undone virtually overnight.

Just last week, [Twitter announced](#) it would “stop all political advertising on Twitter globally,” a change that will go into effect later this month. It's still unclear exactly how Twitter will define political ads, or what will happen to its existing political ad library.

The American people deserve information about online political ads and their sponsors that is uniform, reliable, and accessible. And there's widespread support for improving the status quo.

A bipartisan group of digital media professionals [recently urged](#) lawmakers to embrace stronger transparency requirements and create uniform standards that apply to all digital advertising. In May, a bipartisan group of more than 100 former elected officials [sent a letter](#) to Congress supporting the Honest Ads Act. Even Facebook CEO Mark Zuckerberg has [said](#) that “people shouldn't have to rely on individual companies addressing these issues by themselves,” and Twitter CEO Jack Dorsey [has called for](#) “more forward-looking political ad regulation.”

When the United States has been under attack by foreign adversaries in the past, we have come together and responded. That's what Americans do. It is time for Congress and the Federal Election Commission to adopt proposals that address the totality of the problem and reassure Americans that foreign actors are not buying digital political ads to interfere with our elections. •



Facebook ad purchased by Army of Jesus, a page connected to Russian agents.

DIGITAL DISASTER

The rise of digital ad spending

For the first time in history, U.S. companies will [spend](#) more on digital ads this year than on television, print, and radio ads combined. In the coming years, the gap between spending on digital ads and these other mediums is only expected to grow.

Advertising on social media platforms is a particularly potent way to reach people, as roughly [70% of Americans](#) say they use social media at least once a day.

Political groups as well as companies recognize the advantages that digital advertising provides. Digital ads can be more cost-effective and more personalized than TV or radio ads. Unlike broadcast ads, they can be micro-targeted to reach specific demographic or geographic groups – which is [exactly what campaigns are doing](#) to reach specific types of voters.

Spending on online political ads is big, and it's only getting bigger. Advertising industry observers have estimated that [\\$2.9 billion](#) will be spent on digital political ads during the 2020 election cycle, likely around 30% of all of the money that will be spent on advertising in this election. That's up from [\\$1.4 billion](#) during the 2016 election. And up from [\\$22 million](#) in 2008.

Even as more and more dollars are being spent on digital ads, a few dollars go a long way online, making it a cheap and easy way to persuade – or manipulate – millions of potential voters.

Facebook, for instance, estimated that [99% of the ads](#) bought by the Russian government-linked [Internet Research Agency](#) between 2015 and 2017 cost less than \$1,000, and half of them cost less than \$3. But these ads reached about 11.4 million Americans.

It's also incredibly easy to ramp up digital spending, meaning groups that are only spending small sums today may soon be making much larger ad buys.

As of the publication date of this report, Google says that [more than 160,000](#) political ads have been purchased on its properties since May 2018 by roughly 1,000 advertisers, while Facebook says that [more than 5 million](#) political ads have targeted U.S. users during the same time by more than 140,000 candidates, political parties, and other groups.

A few dollars go a long way online, making it a cheap and easy way to persuade – or manipulate – millions of potential voters.

Different platforms, different transparency policies

Unlike in 2016, Facebook, Google, and Twitter now require documentation before a group can run political ads in the United States. But the three verification processes differ widely. And despite these procedures, weaknesses remain that could be exploited by foreigners.


For instance, the public must take [dark money groups](#) at their word that they are not accepting foreign money for any electioneering activities, which is illegal under current law. Yet malicious foreign actors may be attempting to launder money through dark money groups to influence U.S. elections.

Additionally, Facebook, Google, and Twitter have different criteria for which ads count as “political” and will be included in their online databases of political ads. The rules and guidelines for each of these platforms are dizzying and needlessly complex, and they leave the country in the position of having each digital company enforce its own varying standards for transparency.

Facebook, for instance, [validates](#) advertisers under the broad umbrella of “ads about social issues, elections, or politics,” specifically including ads about “social issues in any place where the ad is being run” as well as ads mentioning political figures or candidates for public office.

For its part, Google’s policies apply only to ads that mention [federal candidates or officeholders](#). And Twitter distinguishes between advertisers certified to run “[political campaigning](#)” ads and those certified to run “[issue ads](#)” – though some certified issue advertising accounts are running ads that are indistinguishable from ads sponsored by political campaigning accounts.

Later this month, Twitter will modify its current system as it [implements plans to ban most political ads](#).

 DIFFERENT PLATFORMS. DIFFERENT RULES.	
	<i>How the company defines election ads</i>
FACEBOOK	Ads that are "made by, on behalf of, or about a current or former candidate for public office, a political figure, a political party, a political action committee, or advocates for the outcome of an election to public office" as well as ads that are about "any election, referendum, or ballot initiative, including 'get out the vote' or election information campaigns"
GOOGLE	Ads that feature a current federal officeholder or candidate.
TWITTER	Ads purchased by a political committee or candidate registered with the Federal Election Commission as well as ads that "advocate for or against a clearly identified candidate for federal office."
SNAPCHAT	Ads about candidates, parties, political action committees, ballot measures, and referendums, as well as ads that "urge people to vote or register to vote."
	<i>How the company defines issue ads</i>
	Ads that are about "social issues in any place where the ad is being run" or are "regulated as political advertising" – including ads about civil and social rights, crime, the economy, education, environmental politics, guns, health, immigration, political values and governance, and security and foreign policy.
	Not applicable at this time.
	Ads that refer to an election or a clearly identified candidate for federal, state, or local election, or advocate for "legislative issues of national importance."
	Ads concerning issues or organizations that are the "subject of debate on a local, national, or global level, or of public importance" – including ads about abortion, immigration, the environment, education, discrimination, and guns.
Note: Twitter recently announced it would cease “all political advertising” on its platform, effective Nov. 22, 2019. It’s not yet clear how Twitter will define political ads.	
Note: View the full policies for Facebook , Google , Twitter , and Snapchat .	

Transparency helps fight the disinformation that divides Americans and undermines our democratic elections

One of the ways that Russian agents interfered in the 2016 election was by [using online advertising](#) to spread disinformation. Unfortunately, little has changed since then to keep Russia – or other foreign adversaries such as China, Iran, North Korea, and even non-state actors – from doing the same thing again.

Congress, to date, has failed to pass any new laws to combat foreign inference and bring more transparency to online ads. Likewise, the Federal Election Commission (FEC) has failed to take any official action and is unlikely to do so any time soon, as it has been [effectively shut down](#) since the beginning of September.

Even the tech companies know that they cannot counter attacks from malicious foreign adversaries alone. As Facebook's Zuckerberg has said, "As a private company, we don't have the tools to make the Russian government stop. We can defend as best we can, but our government is the one that has the tools to apply pressure to Russia, not us."

Transparency laws for political ads in both the [Communications Act](#) and the [Federal Election Campaign Act](#) are based on the principle that people are entitled to know who is trying to persuade them. The ideal is to have information presented in a way the average person can understand. The American people deserve information about online political ads that is uniform and accessible – with standards that are easily enforced and consistent across platforms – so they can verify for themselves that foreign actors are not targeting them with paid online political ads.

The use of transparency policies to combat disinformation is not new. Beginning with radio advertisements in 1927, federal law has required the identification of ad sponsors [because](#) "listeners are entitled to know by whom they are being persuaded." In the decades since, Congress has repeatedly acted to expand transparency laws to additional mediums, including broadcast television and cable – measures that have been upheld by the U.S. Supreme Court as constitutional.

But our 20th century laws have not kept pace with 21st century technologies, leaving social media platforms vulnerable to exploitation by hostile foreign actors intent on disrupting our elections and sowing division in our country.

What should be done


The bipartisan, bicameral [Honest Ads Act](#) is the best first step to stopping paid, online foreign disinformation campaigns that target our elections.

The Honest Ads Act [would address](#) current deficiencies in transparency rules that allow foreigners to influence U.S. elections through paid online advertising. Not only would this bill require that online platforms make reasonable efforts to ensure the political ads they disseminate are not purchased by foreigners, it would also implement a commonsense transparency system for paid online political advertising that is closely modeled on [long-standing Federal Communications Commission rules](#) for paid political advertising on television and radio.

Under the Honest Ads Act, major digital platforms would be required to maintain a publicly accessible database of "qualified political advertisements" related to political candidates and "national legislative issue[s] of public importance."

Within these databases, the public would be able to find digital copies of each ad, a description of the audience targeted by the ad, the number of views generated, the dates and times of publication, and the rate charged. Groups that are not authorized by political candidates would also be required to provide contact information for the purchaser of the ad. Authorized campaign committees would need to list the name of their treasurer.

Additionally, the Honest Ads Act would amend the law to ensure that paid digital ads that refer to federal candidates in the immediate run-up to an election are subject to campaign finance disclosure requirements.

PUBLICLY DISCLOSED INFORMATION ABOUT POLITICAL ADS			
	CURRENT RULES FOR TV & RADIO:	CURRENT RULES FOR ONLINE:	RULES UNDER HONEST ADS ACT:
Who purchased a political ad	✓	✗	✓
Which candidate or national legislative issue the ad is about	✓	✗	✓
When the ad will run	✓	✗	✓
How much the ad cost	✓	✗	✓

Today, the Honest Ads Act enjoys [growing bipartisan support](#) in both chambers of Congress, where it has been sponsored by 20 Democrats and 19 Republicans, including Sens. Amy Klobuchar (D-MN), Lindsey Graham (R-SC), and Mark Warner (D-VA) and Reps. Derek Kilmer (D-WA) and Elise Stefanik (R-NY).

Support for the Honest Ads Act also continues to increase outside of Congress. It has been endorsed by advocacy groups including the Alliance for Securing Democracy, Campaign Legal Center, and Sunlight Foundation, as well as technology companies such as Facebook, Microsoft, and Twitter.

Opponents who allege that the Honest Ads Act would chill speech ignore the long-standing disclosure of funding sources of political ads on TV and radio that have been in place for decades without compromising the First Amendment in any way.

As recently as 2010, the Supreme Court, in [an 8-1 decision](#), upheld the constitutionality of disclosure requirements for political spending, writing that “transparency enables the electorate to make informed decisions and give proper weight to different speakers and messages.”

What’s more, members of Congress are not the only ones in Washington who can take action to bring more transparency to online ads and help prevent foreign interference in our elections. When the FEC regains a quorum, it should [complete its rulemaking](#) about the disclaimer requirements for digital ads. For years, the FEC has been unable to set uniform standards for all digital ads, even as it [issued an advisory opinion](#) to a dark money group last year stating that disclaimers were required to appear on large Facebook image and video ads.

Issue One [has urged](#) the FEC to adopt a bright-line standard – consistent with the standard proposed in the Honest Ads Act – that would permit an abbreviated disclaimer on digital ads only when displaying a full disclaimer is not possible.

Unfortunately, in August, the FEC [stalled in its quest](#) to reach a compromise between its Republican commissioners and its Democratic-aligned commissioners. Then, on August 31, one of the commissioners [resigned](#), leaving the FEC without the quorum necessary to take official actions such as crafting new rules.

One thing remains clear: Now is the time for Congress and the FEC to provide tech companies with uniform transparency rules for online ads. A hodgepodge of voluntary efforts isn’t adequate to provide Americans with the information they deserve about who’s trying to persuade them with online ads, and it isn’t enough to protect our elections from foreign interference. •

CHAMPIONS OF THE HONEST ADS ACT



Photo by: Gage Skidmore, CC BY-SA 2.0, via Flickr

“Foreign interference in U.S. elections – whether Russia in the 2016 presidential election or another rogue actor in the future – poses a direct threat to our democracy.”

– SEN. LINDSEY GRAHAM (R-SC)

“A patchwork of voluntary measures from tech companies isn’t going to cut it ... We must have consistent standards for transparency and accountability in the digital ad space.”

– SEN. AMY KLOBUCHAR (D-MN)



Photo by: Fortune Live Media, CC BY-NC-ND 2.0, via Flickr



Photo by: Fortune Conferences, CC BY-NC-ND 2.0, via Flickr

“The Honest Ads Act will prevent foreign actors from influencing our elections by ensuring that online political advertising follows the same rules as television advertising and discloses the purchaser.”

– REP. ELISE STEFANIK (R-NY)

“The American people deserve to know who is paying for the political ads they see online.”

– REP. DEREK KILMER (D-WA)



Photo by: Ronald Woan, CC BY-NC 2.0, via Flickr

CASE STUDIES



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Overview

For this analysis, Issue One pored over data related to thousands of political advertisers on Facebook, Google, and Twitter. Even as experts well-versed in political advertising and government data, we not only encountered problems in the companies' databases, we also experienced major challenges to using each of them. The following case studies exemplify the inadequacies, opaqueness, and flaws that we found.

Some of the examples chronicled in the pages that follow show how mysterious organizations are buying digital ads. Some show how difficult the companies' databases are to use. Some show inadequacies that are indicative of larger trends – problems that, in aggregate, are larger than their individual shortcomings.

Combined, these examples underscore how the Facebook, Google, and Twitter databases each fall short of the current standards in place for TV and radio ads, as well as the standards that would be set by the [Honest Ads Act](#) – the bipartisan legislation supported by Issue One that would bring more transparency to online ads and help prevent foreign interference in our elections.

While some examples involve sums of money that may not be eye-popping, in the digital world, a small ad buy can have great reach. Facebook, for instance, estimated that [99% of the ads](#) bought by the Russian government-linked [Internet Research Agency](#) between 2015 and 2017 cost less than \$1,000, and half of them cost less than \$3. But their ads reached about 11.4 million Americans – that's equivalent to the combined number of votes cast in 2016 in the swing states of Michigan, Minnesota, and Wisconsin. The important takeaway: A few dollars go a long way online, making it a cheap and easy way to manipulate millions of potential voters.

For companies that pride themselves on crafting beautifully designed, highly functional digital products, it is inconceivable that Facebook, Google, and Twitter don't have the technical expertise or capacity to produce political ad databases that are user-friendly and informative for ordinary voters, reporters, and academic researchers alike.

Given the inadequacies and inconsistencies of these political ad libraries, Issue One has, in conjunction with this report, also released a [tip sheet](#) for reporters and the public to better understand the data contained in these databases.

What you need to know about the corporate political ad databases

In response to foreign interference in the 2016 election, [Facebook](#), [Google](#), and [Twitter](#) voluntarily made changes to their political advertising policies to increase transparency and make it harder for foreigners to purchase ads. They also created new searchable databases of political ads.

Unlike in 2016, Facebook, Google, and Twitter now require documentation before a group can run political ads in the United States. But these three verification processes differ widely, and later this month, Twitter will modify its current policies as it [implements plans to ban most political ads](#) on its platform.

Of the corporate political ad databases, Google's is the most accessible. Its interactive, online "[Political Advertising Transparency Report](#)" features summary data, a map of spending by state and congressional district, the top search terms people buy ads on, and a complete, searchable repository of ads. It also includes six separate downloadable files that highlight different information, which are easy to sort and filter. (Google's ad library and downloadable files include ad spending on Google as well as YouTube.)

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foreign interference.**

Yet because ad sponsors, during Google's verification process, have the option of providing either an identification number provided by the Federal Election Commission (FEC) or one provided by the IRS, many sponsors of Google ads appear in the company's database twice – with some spending tied to the group's FEC-issued ID number and some tied to group's IRS-issued Employer Identification Number (EIN).

Notably, Google is the only company that both publicly displays and includes in its downloadable data the EIN

number or FEC-issued ID number associated with each political ad buyer. Such identifying information is useful because the names of ad sponsors are sometimes ambiguous, intentionally anodyne, or incredibly commonplace. A publicly displayed identification number helps people track down more information about a group.

By contrast, Twitter does not provide any sort of downloadable data regarding its political ad archive. It simply displays two separate lists – one for certified ["issue advertisers"](#) and one for certified ["political campaigning advertisers"](#).


Because of this design, it's difficult to search for ads in Twitter's online ad library, which is known as its ["Ads Transparency Center"](#). Frustratingly, the only way to examine ads is to click through to each advertiser's profile and scroll through them. There is no interactive dashboard or easy way to search Twitter ads by date, keyword, disclaimer, or targeting information.

Furthermore, while Facebook has pledged to maintain ads in its political ad database for seven years, political ads on Twitter can be much more fleeting. The company has only guaranteed that ads will be included in its database for seven days, and it's unclear what will happen to this ad library after Twitter [bans political advertising](#) on its platform later this month.

Though many Twitter ads do not vanish after seven days, Twitter has not set a limit for how long ads will be preserved. Moreover, Twitter ads from accounts that are deleted [are not archived at all](#). They disappear forever when the account is deleted – something that does not happen on either Facebook or Google.

Additionally, despite a [requirement](#) by Twitter that political advertisers have public accounts, Issue One's analysis found ad spending on Twitter associated with several accounts that are no longer public – meaning that none of these accounts' ads can be viewed in Twitter's Ads Transparency Center without the advertiser approving you as a follower.

Political ads on Facebook are, likewise, difficult to search in the two resources the company has made to

<div>  <h2>HOW FACEBOOK, GOOGLE, AND TWITTER VERIFY ORGANIZATIONS THAT BUY POLITICAL ADS</h2> </div>				
MUST PROVIDE THE FOLLOWING?	FACEBOOK	GOOGLE	TWITTER (ISSUE ADVERTISERS)	TWITTER (POLITICAL CAMPAIGNING ADVERTISERS)
Copy of a U.S. government-issued ID	✓	✓	✗	Sometimes ³
Mailing address in the United States	✓	✓	✓	Sometimes ⁴
Phone number	✓	✗	✗	✗
Email address	✓	✓	✓	✓
Website URL	✓	✗	✓	✓
IRS-issued EIN or FEC-issued ID number	Optional ¹	✓	Optional ²	Sometimes ⁵
<p>¹ It is optional for groups that run Facebook ads to provide their EIN or FEC ID number. Groups that do are labeled as "confirmed organizations."</p> <p>² Organizations seeking to be verified issue advertisers may provide either their EIN number or an employee's individual taxpayer identification number.</p> <p>³ Groups not registered with the FEC must have an employee provide a copy of a U.S. passport.</p> <p>⁴ Groups not registered with the FEC must provide a U.S. mailing address.</p> <p>⁵ Groups registered with the FEC are required to provide their FEC ID number.</p>				

track digital political ads on its properties – its [“Ad Library”](#) and its downloadable [“Ad Library Report.”](#) Both of these resources include ad spending on Facebook as well as Instagram.

One of the major challenges to Facebook’s online ad library is that there is no easy way to see old ads. While Google’s political ad archive allows users to filter by a specific date or date range, Facebook’s ad library does not. Facebook’s ad library displays ads in an infinite scroll design. Thus, anyone searching for older Facebook ads must manually scroll through ads until they find them – which, for prolific Facebook ad sponsors, can take quite some time.

Ads in Facebook’s online ad library can be filtered by the name of the page being promoted – but this page name doesn’t always correspond to the actual name of the ad sponsor, and more than one group can promote a particular page. Moreover, until late October, search results within Facebook’s online ad library could not be filtered based on the name of the ad sponsor or a particular disclaimer.

Meanwhile, Facebook’s downloadable [“Ad Library Report”](#) includes aggregated information about the total spending by each Facebook page, the text of the associated disclaimer, and the total number of ads for any of the following five timeframes: 1) the last day, 2) the last seven days, 3) the last 30 days, 4) the last 90 days, or 5) “all dates,” meaning since Facebook launched its ad archive in May 2018. However, there is no way for the general public to download data associated with individual Facebook ads. (The company has made an API available to some researchers.)

Additionally, administrators of Facebook pages can write [nearly whatever](#) they want in the field that appears as a disclaimer on ads. Facebook does not impose standardized disclaimer names on any ad sponsor. This has led to some journalists [deliberately using false names](#) to show how the system is broken.

In August, Facebook announced plans to embrace additional transparency practices, including [requiring](#) political ad sponsors that want to become verified as “confirmed organizations” to submit either their FEC-issued ID numbers or IRS-issued EIN numbers. Yet Facebook is only publicly displaying political ad sponsors’ FEC-issued ID numbers – not groups’ EIN numbers. And this identifying information is only shown deep within Facebook’s ad library. Disappointingly, neither EIN numbers nor FEC-issued ID numbers are included in any of Facebook’s downloadable data sets.

Furthermore, in September, the multimedia messaging app Snapchat [released](#) its own database of [political ads on its platform](#). At this time, Snapchat’s political ad library is simply two downloadable spreadsheets – one with ads that ran on its platform in 2018, and one with ads that have run so far in 2019. Unlike Facebook, Google, and Twitter, Snapchat does not offer an interactive dashboard to search ads online or showcase any aggregated summary information.

Snapchat’s downloadable files, however, are easy to sort and filter. Among the fields included in the databases are the exact amount spent on each ad, the exact number of impressions, the date the ad began running, the date the ad stopped running, the organization name of the ad’s sponsor, the ad sponsor’s billing address (if they provided it), and targeting information for each ad. There is also a unique ID and a unique URL for each ad, meaning every ad in Snapchat’s political ad library can be viewed online.

These four companies have put a lot of effort into designing each of their political ad databases. This means, ultimately, that information that is difficult to search or analyze is difficult by design.

The stark inadequacies of these databases underscore the fact that their creation was part of public

In short, the platforms’ policies are a mess, and the databases they’ve created to help the public monitor digital ad spending in U.S. elections are deeply flawed.

relations efforts by the companies, after members of Congress expressed indignation over the abuse of these social media platforms by foreign adversaries in 2016. It's also worth remembering that without a new law, these political ad databases will only exist as long as the companies desire and could change without notice at any time.

1. Examples of dark money ad spending that would have been reported to the FEC if digital ads followed the same rules as broadcast ads

ONE NATION, THE LEAGUE OF CONSERVATION VOTERS

Today, dark money groups must only report their spending on digital ads to the FEC if the ads [expressly advocate for the election or defeat of a candidate](#) – a standard that groups often avoid by omitting words like “vote,” “support,” or “oppose” from their ads.

If dark money groups purchase TV or radio ads that mention a “clearly identified candidate” within 30 days of a primary election or 60 days of a general election and are “targeted to the relevant electorate,” then those expenditures [must be reported to the FEC](#). Yet if the same group paid for the same ad to run online during the same period, those digital ads would not be required to be reported to the FEC under the current law.

On the one hand, Facebook, Google, and Twitter's political ad databases provide new details about political spending that would have been hidden before. On the other hand, the information provided in these databases is far from uniform, and the databases don't reveal the same details that FEC filings would. For instance, spending information in the Facebook and Google databases is often provided only in broad ranges, unlike FEC filings, which show the exact amount.

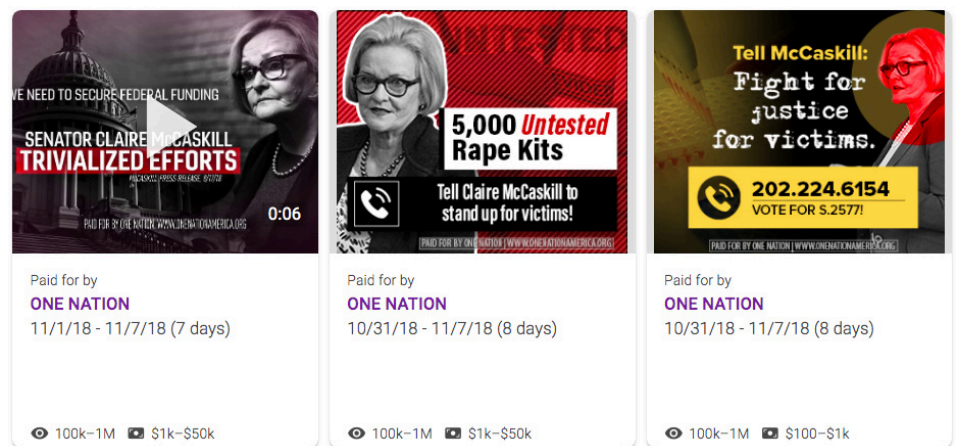


Facebook ad purchased by the League of Conservation Voters.

One Nation and the **League of Conservation Voters** are among the dark money groups that paid for digital ads ahead of the 2018 midterm elections that were political in nature but fell short of explicitly urging people to vote for or against a particular candidate. Because these ads were never broadcast on radio or television, they were never reported to the FEC.

Records in these digital ad databases show that One Nation – a conservative group led by Steven Law, a former executive director of the National Republican Senatorial Committee who once served as chief of staff to now-Senate Majority Leader Mitch McConnell (R-KY) – paid for ads on [Facebook](#), [Google](#), and [Twitter](#) that focused on one of the most contentious Senate races in the 2018 midterm elections.

Google's records indicate that One Nation spent at least \$20,000 – and



Google ads purchased by One Nation. Each shows a range for how many people saw each ad and how much each ad cost.

possibly as much as \$900,000 – on ads that criticized incumbent Sen. Claire McCaskill (D-MO) for not doing enough, in its view, for rape victims, and praised McCaskill's Republican opponent Josh Hawley, then the state's attorney general. Because Google's political ad database lists only broad ranges for how much a group spends on each ad, it's impossible to know exactly how much money One Nation spent on these ads. The group also spent thousands of dollars on Facebook and Twitter ads.

The League of Conservation Voters – an environmental group that does not disclose its donors and has emerged as [one of the top-spending liberal dark money groups](#) in the post-*Citizens United* era – also [ran ads on Facebook](#) that mentioned federal candidates in the run-up to the election. Some of these ads praised senators who opposed Brett Kavanaugh's Supreme Court nomination, including Sens. Mazie Hirono (D-HI), Bob Menendez (D-NJ), and Elizabeth Warren (D-MA), who were all up for re-election.

Like Google, Facebook's political ad database lists only broad ranges for how much a group spends on each ad, so it's impossible to know precisely how much money the League of Conservation Voters spent on these ads praising Hirono, Menendez, and Warren in the 60 days leading up to the election. Facebook's records indicate it was at least \$3,000 – and potentially as much as \$15,000.

Had any of these ads by One Nation or the League of Conservation Voters been broadcast on television or radio, they would have been required to be reported to the FEC because they mentioned clearly identifiable candidates during the run-up to an election and were targeted to the relevant electorate. And had they been reported to the FEC, the exact cost of these ads would be known, instead of only broad ranges.

The bipartisan [Honest Ads Act](#), which Issue One helped draft, would ensure that spending on digital ads that mention candidates ahead of an election – including those that tout or criticize candidates for their positions, characteristics, or actions – are required to be reported to the FEC in a uniform way.

2. Examples of ads that fail to live up to the standards of the Honest Ads Act

Today, dark money groups run political ads on TV, radio, and the internet with disclaimers that don't say much about them. They often pick anodyne names that intentionally fail to provide context about whether they are liberal or conservative groups, or whether they are funded by any particular special interest group.

The bipartisan [Honest Ads Act](#) would strengthen current transparency requirements for digital ads by requiring dark money groups to provide the name, address, and phone number of the person purchasing each ad, as well as a list of the group's chief executive officers, board members, or executive committee members.

None of the databases created by Facebook, Google, or Twitter live up to this standard. In many cases, someone can only learn who is behind an ad they are seeing if they leave the platform on which they encounter the ad and sift through information on other websites – which is far from the ideal transparency system.

Issue One's analysis uncovered a number of cases in which rigorous online searching was required – leaving Facebook, Google, and Twitter to visit other websites – to learn meaningful information about innocuously named ad sponsors. As veteran political money sleuths, we were aware of websites and resources that most people seeing these ads would not be able to draw upon.

Here are just some of the examples of innocuously named dark money groups that appear to be hiding their true backers:

DEFEAT ANTI-SEMITISM, INC.

Here's an example of an ambiguously named front group appearing to use dark money from unknown donors for partisan purposes. In June 2019, a group called **Defeat Anti-Semitism, Inc.** created accounts on [Twitter](#) and [Facebook](#) with the handle "StopJewishHate."

Its [ads on Twitter](#) have encouraged people to follow the account to "join the cause in defeating anti-Semitism in America and within Congress" because "it's time to stop standing by while elected officials allow anti-Jewish and anti-Israel sentiments to grow."

Its [ads on Facebook](#), meanwhile, have criticized Rep. Rashida Tlaib (D-MI) for, in its view, "hateful rhetoric," called Rep. Ilhan Omar (D-MN) the "poster child for anti-Semitism in Congress," and urged House Speaker Nancy Pelosi (D-CA) to remove Omar from the House Foreign Affairs Committee.

Who's responsible for these ads? Nothing in the Facebook or Twitter ad databases makes that clear.

Issue One obtained records from the office of Delaware's secretary of state showing that Defeat Anti-Semitism, Inc. was [incorporated in Delaware](#) in May 2019 as a 501(c)(4) "social welfare" organization, but it is unknown who is bankrolling the group.

The group's [incorporation records](#) provide one clue about who is behind the organization: Lawyer [Jeffrey Altman](#) of the firm Whiteford, Taylor, and Preston is listed as its incorporator.

Altman also serves as counsel for several other prominent pro-Israel groups, including the [Republican Jewish Coalition](#) and the [Jewish Policy Center](#). He was also an officer of the conservative dark money group Secure America Now — [largely funded by billionaire hedge fund manager Robert Mercer](#) — that infamously aired a series of controversial ads during the 2016 election that showed France, Germany, and the United States coming under the control of Islamic extremists.

ACCOUNTABLE NEW YORK

Here's an example of an ambiguously named front group appearing to use dark money from unknown donors for partisan purposes — and then vanishing.

In February 2019, voters in New York City went to the polls to vote for the position of public advocate, the elected officeholder who is first in line to succeed the mayor. Ahead of this citywide election, a dark money group called **Accountable New York** sprang into existence and barraged voters with negative ads.

Accountable New York purchased ads on [Facebook](#) and [Google](#), reportedly in hopes of boosting turnout for Eric Ulrich, one of just two Republicans running in the 17-way race.

Defeat Anti-Semitism
Sponsored • Paid for by Defeat Anti-Semitism
ID: 507813583124184

Join us to call on Speaker Nancy Pelosi to formally remove Representative Ilhan Omar from the House Foreign Affairs Committee for repeatedly making Anti-Semitic Comments.

Tell Speaker Pelosi to REMOVE REP OMAR
from House Foreign Affairs Committee

CALL NOW

Call Now
Tell Speaker Pelosi to remove Representative Omar.
STOPJEWISHHATE.COM

Sign Up

Facebook ad purchased by Defeat Anti-Semitism, Inc.

Accountable New York
Sponsored • Paid for by Accountable New York, Inc.
ID: 304731447063965

She cost us 25,000 high-paying Amazon jobs.

SEND OCASIO-CORTEZ A MESSAGE

Vote February 26th for your Public Advocate
WWW.ACCOUNTABLENEWYORK.COM

Learn More

Facebook ad purchased by Accountable New York.

The ads argued that New Yorkers could hold New York City Mayor Bill de Blasio, a Democrat, and freshman Rep. Alexandria Ocasio-Cortez (D-NY) “accountable” by voting in the special election for public advocate.

Nothing in either Facebook or Google’s political ad databases – or in the disclaimers on the online ads themselves – provides any information about who was behind Accountable New York. Press [articles](#) at the time [identified](#) Republican political consultant E. O’Brien Murray as leading the group, which [formed in Delaware](#) in February as a 501(c)(4) “social welfare” organization.

After the election was over, Accountable New York’s online presence disappeared. The group will not be required to file its first tax return with the IRS – which would detail its officers as well as its overall fundraising and expenditures – until late 2020 or early 2021. Even that filing will not reveal who bankrolled the group, meaning its funders will likely remain a mystery to the general public forever.

The group popped up, ran online ads, and has now disappeared.

WOMEN.VOTE

Here’s an example of an ambiguously named front group appearing to use dark money for partisan purposes – turning out Democratic voters – all while concealing the identity of its donors.

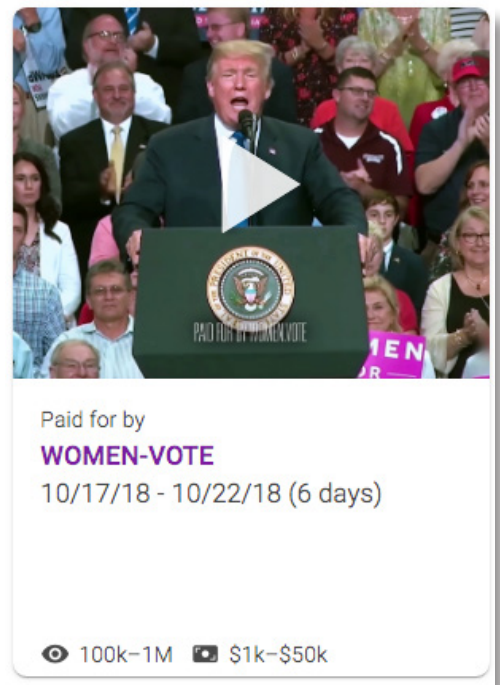
In October 2018, a little-known group called **Women.Vote** spent [about \\$66,000 on Google ads](#) urging women to vote. The ads featured video of President Donald Trump mocking Christine Blasey Ford, the woman who accused Supreme Court Justice Brett Kavanaugh of sexually assaulting her while they were both in high school. (Kavanaugh has denied these allegations.)

Since these ads did not expressly advocate for the election or defeat of any clearly identified candidates, this spending was not required to be reported to the FEC.

According to its [website](#), Women.Vote was established to “increase voter participation in [the 2018] midterm election by helping to register and turn out eligible women across the United States.” But its website does not identify any people associated with the group, nor is an address listed.

Additionally, nothing on the online ads Women.Vote ran or in Google’s political ad database gives any clues about who runs Women.Vote or who actually funded its advertisements. California business records, however, list Democratic megadonor Karla Jurvetson as the [incorporator](#) and [sole officer](#) of Women.Vote, which formed in September 2018 as a 501(c)(4) “social welfare” organization.

After the election, the *East Bay Times* [dubbed Jurvetson](#) “one of the most influential women in political fundraising,” noting that she was not only one of the top political donors in California in 2018 but also in the entire United States. The Center for Responsive Politics ranks Jurvetson among [the country’s top 12 political donors](#) during the 2018 midterm elections, giving more than \$12 million to federal candidates, political parties, and other groups. That sum does not include any money she may have contributed to Women.Vote.



Google ad purchased by Women.Vote.

AMERICANS FOR HEALTHCARE FREEDOM

Here's an example of an ambiguously named front group appearing to use dark money to conceal the identity of its donors.

Last year, as politicians debated the merits of reforming the nation's current health insurance system, a mysterious organization called **Americans for Healthcare Freedom** began running ads online arguing against Medicare for All.

Records show that Americans for Healthcare Freedom has sponsored ads on both [Facebook](#) and [Twitter](#). Some of these ads have disclaimers that say they were "Paid for by Americans for Healthcare Freedom." Others say they were "Paid for by Americans for Government Accountability."

Americans for Healthcare Freedom appears to be a project of Americans for Government Accountability, which is a 501(c)(4) "social welfare" nonprofit based in Chicago that was [formed in August 2018](#).

It's not immediately clear who has been bankrolling this anti-Medicare for All effort. Tax records [list](#) John Tillman as the president of Americans for Government Accountability. Tillman is also the CEO of a pro-free market think tank called [Illinois Policy](#).

Also listed as an officer of Americans for Government Accountability on tax records is [Chaz Cirame](#), the founder of a government relations firm in Alexandria, Virginia, called Cc:External Affairs. Cirame previously worked as the vice president of membership, meetings, and public affairs at the conservative American Legislative Exchange Council (ALEC), a consortium of business executives and state legislators that drafts and distributes model legislation.

HEALTH CARE VOTER

And here's another example of an ambiguously named front group appearing to use dark money to conceal the identities of its donors.

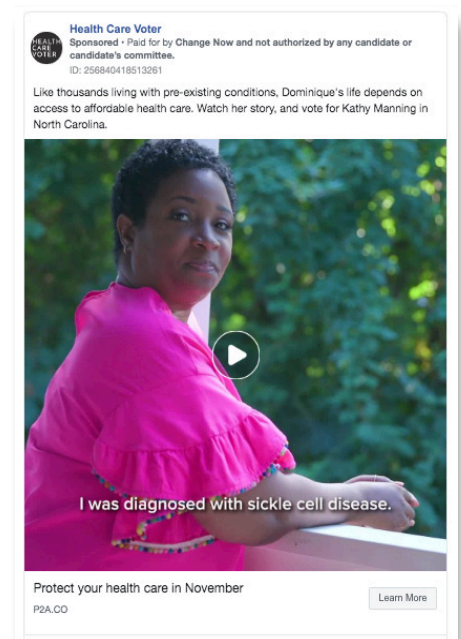
A group called **Health Care Voter** has run digital ads on [Facebook](#) and [Twitter](#) encouraging people to become "health care voters." Some of its ads have expressly called for the election or defeat of certain candidates.

The group's recent ads have run with disclaimers saying they were paid for by "Health Care Voter," but ahead of the 2018 midterm election, many of the group's ads appeared with a different disclaimer, which said their ads were paid for by "Change Now" – the name of a [super PAC](#) that was [substantially funded](#) by a liberal dark money group known as the Sixteen Thirty Fund, which describes itself as "an incubator for social justice projects" because it serves as the "fiscal sponsor" of a number of groups. Yet, as [Politico has reported](#), this structure makes its fundraising "even more opaque than those of a typical secret-money group."

Nowhere on Facebook or Twitter does Health Care Voter note it is connected to a major liberal dark money group. Only if someone clicks on the link to Health Care Voter's website – thereby leaving the social media platform on which they are seeing the group's ad – can they discover, in the [fine print on the bottom of Health Care Voter's website](#), that it is a project of the Sixteen Thirty Fund.



Twitter ad purchased by Americans for Healthcare Freedom.



Facebook ad purchased by Health Care Voter.

Even more recently, Health Care Voter has been running ads on Facebook that link to a website called AffordableInsulinNow.org, which describes itself as a “project of Health Care Voter” without mentioning the Sixteen Thirty Fund at all.

3. Examples of ads in which the name of the ad sponsor is just an intermediary

RECRUE MEDIA. ELECTION DAY STRATEGIES. FORTUNE HILL GROUP. SUGGESTED POLITICS

Sometimes the ads in the Facebook, Google, and Twitter ad databases are connected to the firms that place them, or some other proxy account, rather than the true sponsor of the ads.

This makes it difficult for the public to fully assess all of an ad sponsor’s political spending – and challenging to find the spending by certain sponsors in the first place. It also stands in stark contrast to long-standing [Federal Communications Commission regulations](#) that require TV stations to “fully and fairly disclose the true identity” of ad sponsors in addition to “stating the fact that the broadcast matter was sponsored.”

For instance, as of the publication of this report, Google lists [Recrue Media](#) – a [full-service digital media agency](#) with offices in Los Angeles, California, and Providence, Rhode Island – as having spent about \$360,000 on approximately 6,500 ads. Yet Recrue Media is just the intermediary; all of the ads associated with the company were paid for by other groups, such as the **American Action Network**, the **American Conservative Union**, and the **Alliance for Patient Access** – sponsors whose names are often noted on the ads themselves.

This was just one of more than three dozen such examples that Issue One discovered in Google’s ad database. This represents a significant deficiency. People cannot get a true sense of how much money a particular political group has spent if some ads are associated with an ad-buying firm instead of the ad’s actual sponsors.

Twitter and Facebook’s ad databases also list vendors as the sponsors of political ads.

For instance, Issue One’s analysis found numerous Facebook ads sponsored by the firms behind the ads rather than the candidates the ads supported. One firm, [Election Day Strategies](#), has run ads for **John Medina**, who is running for mayor in Corpus Christi, Texas. And this fall, the [Fortune Hill Group](#) sponsored ads promoting fundraising events for Democratic presidential candidates **Joe Biden** and **Cory Booker** – ads that are not associated with either candidate’s own page in Facebook’s ad library.

Issue One also uncovered an innocuously named Twitter account called [“Suggested Politics”](#) that has been certified by Twitter as a “political campaigning account.” The account’s bio states that it is owned and operated by [Storylift](#), a firm [that says](#) it works to “ensure the right message reaches the right audience.” Storylift appears to use this account to promote political advertisements by clients across the ideological spectrum.

Notably, three different entities paid for Twitter ads associated with the Suggested Politics account ahead of the 2018 midterm elections.



Twitter ad purchased by the We Stand for Better super PAC using Suggested Politics, an intermediary.

Some of the ads promoted through the Suggested Politics account were paid for by the official campaign committee of **Jerry Trooien**, an independent U.S. Senate candidate in Minnesota. Yet in Twitter's ad archive, [Trooien's campaign](#) does not have any ads associated with its account.

Other ads promoted through the Suggested Politics account were sponsored by a super PAC called **We Stand for Better** — which federal campaign finance filings show was [single-handedly funded](#) by [Carson Block](#), a short-seller and founder of Muddy Waters Research. These ads focused on a U.S. House of Representatives race in Pennsylvania. For its part, We Stand for Better does not even have a Twitter account of its own.

Meanwhile, ads that Suggested Politics ran touting Democratic House candidates Ben McAdams in Utah and Anthony Brindisi in New York were actually ads promoting articles about McAdams and Brindisi paid for by a media organization called **The Well News**. According to its website, The Well News was started to combat the “proliferation of toxic political rhetoric and inaccurate, misleading ‘news’ [that] has divided our country.” In Twitter's ad archive, [The Well News](#) does not have any ads associated with its account.

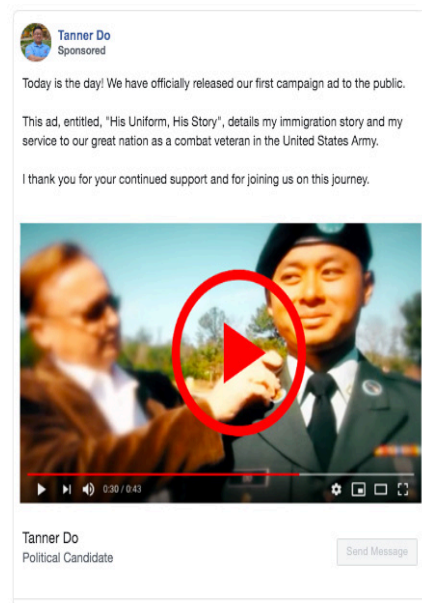
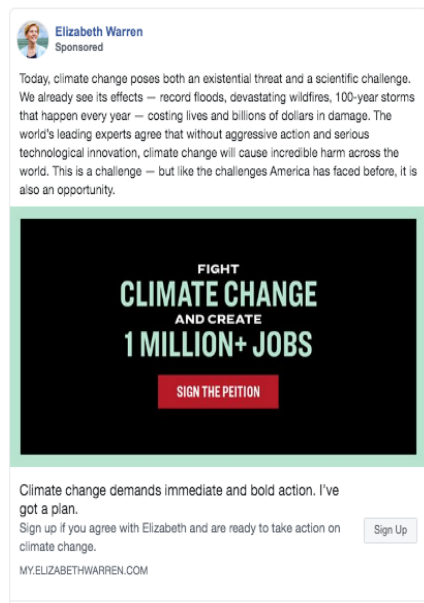
While disclaimers appeared with the ads running through the Suggested Politics account that stated the names of the different groups that paid for them, this spending is only detailed in Twitter's ad archive on Suggested Politics' page — not on the pages associated with any of the actual ad sponsors. As with Google's ad database, this creates issues with assessing how much money an ad sponsor has actually spent.

4. Examples of ads that ran without disclaimers

Believe it or not, not every online political ad appears with a disclaimer about who paid for it.

For [years](#), the FEC commissioners [have argued](#) and remained divided about [whether small digital ads](#) must include disclaimers. Facebook's own policies now require that political ads on its platform appear with disclaimers above the ads that show who paid for them. Yet not every ad does.

To its credit, Facebook makes efforts to identify political ads that run without disclaimers and adds them to its database. Last year, [researchers at New York University](#) concluded that it took Facebook about 5.5 days to spot political ads without disclaimers and add them to the company's political ad database.



Facebook ads without disclaimers purchased by Bluegrass Values, Democratic presidential candidate Elizabeth Warren, and Democratic congressional candidate Tanner Do.

Issue One's analysis revealed more than 6,500 pages in Facebook's political ad database that ran roughly 25,000 ads without disclaimers between June and September of this year.

ADS WITHOUT DISCLAIMERS SPONSORED BY CANDIDATES AND POLITICAL ACTION COMMITTEES

Some of these ads that ran without disclaimers were paid for by candidates' own campaigns, including ads sponsored by the presidential campaign of Democrat **Elizabeth Warren**, the presidential campaign of Democrat **John Hickenlooper**, a [PAC connected to the Democratic Governors Association](#) that is supporting Democratic gubernatorial candidate **Andy Beshear** in Kentucky, and the campaigns of a handful of Democratic and Republican congressional candidates.

ADS WITHOUT DISCLAIMERS SPONSORED BY COMPANIES SELLING POLITICAL MERCHANDISE

Some of the other Facebook ads that ran without disclaimers were connected to companies selling political apparel and merchandise.

For instance, Issue One's analysis revealed more than 5,000 ads since May 2018 sponsored by a page called "**Hear Our Voice**," which sells clothing supportive of liberal icons such as Democratic presidential candidate Bernie Sanders, Democratic presidential candidate Kamala Harris, and Supreme Court Justice Ruth Bader Ginsberg.

Hear Our Voice – which is operated by individuals in Vietnam – has spent more than \$167,000 on ads, and none of them have included disclaimers.

Similarly, Issue One's analysis revealed hundreds of ads since May 2018 sponsored by a page called "**I like the 45th POTUS**," which sells pro-Donald Trump clothing and merchandise and is also operated by individuals in Vietnam.

The "I like the 45th POTUS" page has spent more than \$12,000 on ads. None have included disclaimers, and some are still targeting Facebook users in the United States today.

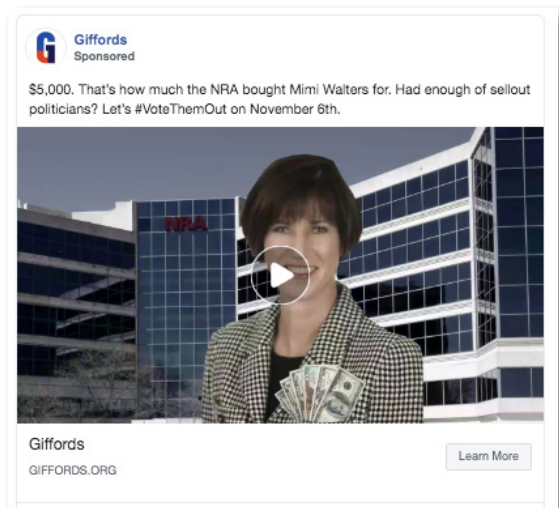
ADS WITHOUT DISCLAIMERS FROM AN UNCLEAR SPONSOR

Another Facebook page that has been promoted by ads running without disclaimers is called "**Giffords**," which is associated with the organization dedicated to fighting gun violence that was founded by former Rep. Gabby Giffords (D-AZ) after she survived an assassination attempt in 2011.

Giffords is a 501(c)(4) "social welfare" nonprofit organization that is affiliated with a related political action committee. Records show that both the nonprofit and PAC have paid for ads boosting the Giffords Facebook page. Some ads have been jointly paid for by both entities. Yet more than \$60,000 has been spent since May 2018 on ads promoting the Giffords page that ran without disclaimers, meaning it's unclear which of the two gun safety groups paid for these ads. Spending on ads that ran without disclaimers accounts for about 10% of all spending to promote the Giffords page.



Facebook ad without a disclaimer by Hear Our Voice.



Facebook ad without a disclaimer promoting Giffords.

5. Examples of ads that game transparency rules

PATRIOT MAJORITY USA

Last year, a liberal dark money group called [Patriot Majority USA](#) ran about \$63,000 worth of [ads aimed at](#) turning out voters in California's June 5 primary election.

But Patriot Majority USA did not use its Facebook page to drive these messages. Rather, it sponsored ads using three separate Facebook pages it controlled — “[Send DC A Message on June 5th](#),” “[Vote For A Better California](#),” and “[Your Voting Record Is Public](#).”

Organizations must have a Facebook page to run ads on Facebook, but the page name is not required to reflect the sponsoring organization's actual name. Without the disclaimers that appeared with these Facebook ads, viewers would not have known that these Facebook pages were actually connected to this liberal dark money group.

Craig Varoga, the veteran Democratic political strategist behind Patriot Majority USA, [told the Huffington Post](#) that Patriot Majority USA used slogans as page names because the page name was the first thing that people would see when viewing the group's ads.

It was important, Varoga said, to have “content that will drive the message we're looking to spread” in that “valuable real estate,” rather than displaying its legal name in the prominent position Facebook ads give to the page name.

6. Examples of ads that are no longer visible in companies' ad libraries

AMERICANS FOR FARMERS AND FAMILIES. BEVERLY GOLDSTEIN. DAVID STEMERMAN

[Americans for Farmers and Families](#) [describes itself](#) as “a coalition dedicated to preserving NAFTA & working with President Trump to negotiate a modernized agreement for the 21st century.” It's a [project](#) of the Corn Refiners Association, the National Corn Growers Association, the American Farm Bureau Federation, and the National Pork Producers Council, and it has been certified by Twitter as an “issue advertising account.”

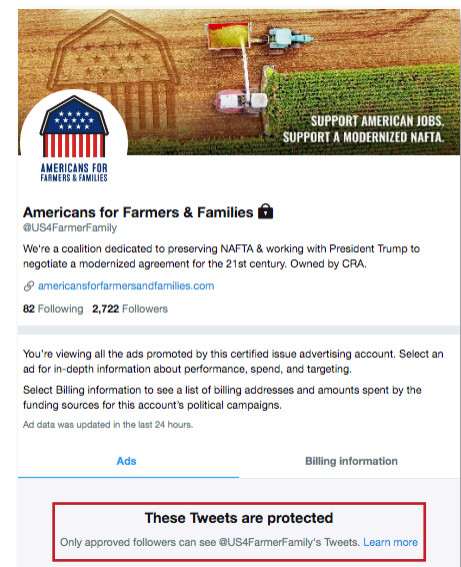
Want to see the ads that Americans for Farmers and Families purchased on Twitter or the information about whom those ads targeted? Tough luck.

Because Americans for Farmers and Families has set its Twitter account to private, the group's ads can only be viewed by accounts that Americans for Farmers and Families approves as followers. This is despite Twitter's requirement that certified advertisers have public accounts. (Presumably, the ad spending occurred before the account was set to private.)

In all, Issue One's analysis found ad spending by four accounts certified by Twitter as either “political campaigning accounts” or “issue advertising accounts” that are currently set to private — meaning that none of these ads, or information



Facebook ad purchased by Patriot Majority USA.



Americans for Farmers and Families' page in Twitter's ad library.

about whom these ads targeted, can be viewed in Twitter's political ad archive without the advertiser approving you as a follower.

As of the publication date of this report, in three of these four cases, Twitter has suspended the account in question. Two of these now-private-and-suspended accounts are associated with Republicans who unsuccessfully ran for public office in 2018 – [Beverly Goldstein](#), who ran to represent Ohio's 11th Congressional District in Congress, and [David Stemerman](#), who ran for governor in Connecticut.

These examples are a reminder of the ephemeral nature of Twitter's political ad archive. Twitter has only guaranteed that ads will be included in its database for seven days. Though most Twitter ads do not vanish after seven days, Twitter has not set a limit for how long ads will be preserved. Moreover, Twitter ads from accounts that are deleted are not archived at all. They disappear forever when the account is deleted.

7. Examples of ads that are inaccurately captured as political ads because of inconsistent corporate policies

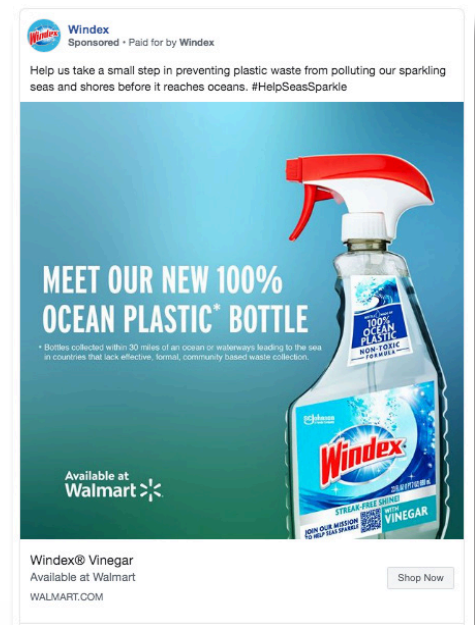
WINDEX. HINGE

Facebook, Google, and Twitter have different criteria for what ads count as “political ads” that need to be included in their online databases of political ads.

Without uniform standards, some of the ads in these databases are seemingly false positives – especially ads from companies with products featuring political messaging (such as apparel and merchandise) or companies with products that may have political implications (such as recycled plastic or solar panels).

Facebook, for instance, has deemed [some Windex ads](#) promoting its recyclable bottles as political. And the dating app [Hinge](#) is among the corporate accounts listed as “certified issue advertising” accounts on Twitter.

Some of the ads Hinge has promoted on Twitter encouraged gay men and other members of the LGBTQ community to sign up for the “relationship-oriented app” because Democratic presidential candidate Pete Buttigieg met his husband Chasten on Hinge. •



Facebook ad purchased by Windex.